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T.R.A. DOCKET ROOM

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December 16, 2005

VIA HAND DELIVERY

Hon. Ron Jones, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Petition of MCImetro Access Transmission Services, LLC for Arbitration of Certain Terms And Conditions of Proposed Agreement with BellSouth Telecommunications, Inc. Concerning Interconnection and Resale Under the Telecommunications Act of 1996*
Docket No. 05-00231

Dear Chairman Jones:

Enclosed are the original and fourteen copies of a *Joint Motion for Continuance of Hearing and Pre-hearing Deadlines*. Counsel for MCI has agreed to the dates and the filing of this *Joint Motion*.

A copy is being provided to counsel of record.

Very truly yours,



Guy M. Hicks

GMH:ch

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: *Petition of MCImetro Access Transmission Services, LLC for Arbitration of Certain Terms And Conditions of Proposed Agreement with BellSouth Telecommunications, Inc. Concerning Interconnection and Resale Under the Telecommunications Act of 1996*

Docket No. 05-00231

**JOINT MOTION FOR CONTINUANCE OF HEARING
AND PRE-HEARING DEADLINES**

BellSouth Telecommunications, Inc. ("BellSouth") and MCImetro Access Transmission Services, LLC ("MCI") jointly request that the Tennessee Regulatory Authority ("TRA") continue the hearing of this matter and all pre-hearing deadlines and filing requirements for the following reasons:

1. The hearing of this matter is currently scheduled for March 8-9, 2006. The parties jointly request a continuance of this hearing date, as well as all pre-hearing deadlines and filing requirements, because of the pending merger between MCI and Verizon, which is expected to close soon. Upon completion of the merger, MCI will need to assess the contract language in dispute and evaluate whether any of its positions on the issues in this case should be modified. The extension will allow MCI to identify any such instances and then inform BellSouth and the TRA of the modifications.

2. As part of MCI's evaluation, it intends to review whether it may be possible to resolve issues on which the parties previously had reached impasse. In this connection, the parties have set aside four days to have face-to-face negotiations during the continuance time period.

3. This request is made jointly; thus no party would be prejudiced. With a continuance, moreover, the parties hope to conserve the TRA's and the parties' time and resources by using the extension period to negotiate the resolution of several issues and remove them from the arbitration.

4. Accordingly, the parties jointly propose that the hearing be rescheduled for July 12-13, 2006, and respectfully request that, if the TRA's schedule permits, the TRA set the remaining deadlines and filings as follows:

March 3, 2006	Parties to file a revised matrix with the TRA to identify any modified or new positions.
March 28, 2006	Parties to file Direct Testimony
May 31, 2006	Parties to file Rebuttal Testimony.
July 12-13, 2006	Hearing.

WHEREFORE, BellSouth and MCI respectfully request that the TRA continue the hearing currently scheduled for March 8-9, 2006 to July 12-13, 2006, and that the TRA reset all remaining pre-hearing deadlines and filings. In addition, BellSouth and MCI request that the TRA allow the parties to file a revised matrix on March 3, 2006, Direct Testimony on March 28, 2006 and Rebuttal Testimony on May 31, 2006.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS,
INC.

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CERTIFICATE OF SERVICE

I hereby certify that on December 16, 2005, a copy of the foregoing document was served on the following, via the method indicated:

- ☐ Hand
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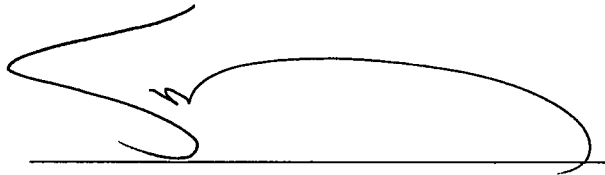
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A handwritten signature in black ink, appearing to read "Donna", is written over a horizontal line.